

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, et al.

Plaintiff,

VS.

BRIAN P. KEMP, et al.

Defendant.

**CIVIL ACTION FILE NO.:
1:17-cv-2989-AT**

DECLARATION OF JASMINE CLARK

JASMINE CLARK hereby declares as follows:

1. I am have been a Georgia voter since 2006 and am currently registered to vote at 280 Braxton Place in Gwinnett County. I have been continuously registered to vote at this address since 2016.
2. My precinct is Lucky Shoals Park and my polling place is located at 4651 Britt Rd, Norcross, GA.
3. I have not made changes to my voter registration while living at this addresss.

4. I am a candidate for Georgia House of Representatives District 108 in the upcoming November, 2018 election.
5. As a candidate, I have become aware of chronic problems in Georgia's electronic election system and I follow the news of Georgia voting problems. I followed news reports of the security failures and breach of the KSU election server and voter files, as well as numerous problems reported with incorrectly assigned districts such as the inaccurate voter assignments of approximately 600 voters reported in House District 81.¹
6. I frequently visit the My Voter Page section of the Secretary of State's website (<https://www.mvp.sos.ga.gov/MVP/mvp.do>) as I campaign and help voters check their registrations, which I routinely encourage them to do.
7. I frequently verify my own registration to be certain that unauthorized changes have not been made. I am aware of the security breaches in the voter files and want to be certain that my registration is never affected.

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<https://politics.myaajc.com/news/state--regional-govt--politics/doraville-voters-might-have-been-given-wrong-ballots/XlyZEXgkEwhuV4q9hrdFvM/>

8. On Election Day, July 24, 2018, I arrived at my precinct polling place at 4651 Britt Rd, Norcross, GA at approximately 7:50 a.m., planning to vote before going to work.
9. A person in line in front of me at the voter check-in table was turned away without voting as I overheard the poll worker tell him that he was in the wrong polling place, although he insisted that it was his traditional polling place. I wondered if discrepancies were being encountered with the electronic pollbooks in my polling place.
10. I presented my drivers license and after the poll official checked the electronic pollbook, he told me that I was not in the pollbook for precinct 012 but that I must go to the Chinese Christian Church on Britt Rd., another precinct nearby, but in a different District.
11. I was completely confident of my polling place precinct assignment and location and refused to leave, but instead made phone calls and inquiries to try to vote in my polling place on a regular (not provisional) ballot.
12. I talked with the precinct workers and managers and was repeatedly told that I was in the wrong precinct polling location and not on the electronic voter list for precinct 012.

13. I opened my smart phone and pulled up my information on My Voter Page and showed the workers that I was present in the correct precinct according to the live Secretary of State's website. They continued to insist that the electronic pollbook showed my voting location at another precinct polling place, and would not issue a ballot for my precinct to me.

14. After spending approximately 25 minutes on the phone trying to resolve my problem, pollworkers told me that suddenly my name had appeared on the electronic pollbook for that voting location. There was no explanation offered as to how this was possible after so many election officials had previously checked the records, reportedly finding that I was not eligible to vote in this precinct 012.

15. I was issued a voter access card and voted my electronic ballot on the touchscreen machine without incident, although I had spent at least a half-hour more at the polls than I had planned. Unlike other people I met that day who were turned away, I had the flexibility to stay to fight for my right to vote in the right precinct on the correct ballot.

16. Although I had no logical explanation for what happened, I took the first opportunity at approximately 10 am that morning to record and post a video to Facebook² to explain my experience to other voters and offer advice on what to do if they encountered voting problems because of their pollbook or voter registration issues.
17. Both as a candidate and a citizen, I am deeply concerned about the security failures of the electronic voting system, and the discrepancies and errors in the electronic pollbooks that disenfranchise and discourage people from voting.
18. I heard people in the precinct 012 polling place who were turned away say that they did not have time to travel to another polling place. I did not hear pollworkers offer them a provisional ballot, making it likely that these people did not get the opportunity to vote.
19. I plan to vote in the November 2018 election and based on my experience, I am concerned that I may be given an inaccurate ballot, or that my name may not be found in the pollbook, or that I will be otherwise disenfranchised.

² <https://www.facebook.com/annakellyleary/posts/10155422963347096>

20. As a candidate, I am concerned about voters in my district potentially being disenfranchised and the impact on my House District 28 race and all other races on the ballot.

21. As additional voting problems are discovered and exposed, I expect that voters will be discouraged from voting and voter confidence will continue to diminish, along with voter turnout, if the immediate corrections are not made to the election system.

I declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on this date, July 31, 2018.

A handwritten signature in black ink, appearing to read 'Jasmine Clark', is written over a horizontal line.

Jasmine Clark